

EXHIBIT

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AFFIDAVIT


Gregory Mahar, being sworn states:

1. I am the Director of Elections in the Office of The Clerk, Elections Division, County of Wayne. I have been the Director of Elections since January 2018.
2. MCL §168.809(2) provides that “The office of the county clerk shall be open on election day for election purposes and shall remain open until the last returns have been received and the clerk completes an unofficial tabulation.”
3. As Director of Elections, my responsibilities include managing the operations of the County Clerk’s Election Division on each election day.
4. On Tuesday, August 4, 2020, the day of the Primary Election, the Election Division, located at 2 Woodward Avenue, Suite 502, Detroit, Michigan, opened at 6:00 a.m. The local clerks delivered statements of returns, tally sheets and poll lists to the Elections Division from 9:00 p.m. election night to 5:00 pm. August 5, 2020. The Elections Division did not close until 5 p.m. on Wednesday, August 5, 2020.
5. If a member of the public requires access to the Coleman A Young Municipal Center after 4:30 p.m., the member must report to the

security desk at the Randolph Street entrance for access to the Elections Division.


6. On each election day, the Elections Division receives telephone calls from local clerks, voters, attorneys, candidates, public officials and media representatives. The Elections Division may receive as many as over 200 telephone calls on each election day. The staff of the Elections Division makes every effort to answer or respond to each telephone call.
7. On August 4, 2020, the Elections Division received at least 200 telephone calls. The staff of the Elections Division made every effort to answer or respond to each telephone call.
8. Because of the high volume of calls, some calls may have been directed to voicemail or inadvertently may not have been answered.

Deponent says nothing further.


Gregory Mahar

Subscribed and sworn to before

me on this 1st day of September 2020.


EN'JOLI CONLEY
NOTARY PUBLIC, STATE OF MI
COUNTY OF WAYNE
MY COMMISSION EXPIRES MARCH 11, 2025
ACTING IN THE COUNTY OF Wayne